

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA**

UNITED STATES OF AMERICA

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CRIMINAL DOCKET NO. 11-270

v.

*

SECTION: J

YONI JAVIER SANTOS-BUSTILLO

*

a/k/a Joni Correa-Santos

a/k/a Jorge Luis Rodriguez-Solis

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a/k/a Yonis Javier Santos

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FACTUAL BASIS

Should this matter have gone to trial, the government would have proven, through the introduction of competent testimony and admissible, tangible exhibits, the following facts, beyond a reasonable doubt, to support the allegations in the indictment now pending against the defendant:

The Defendant, **YONI JAVIER SANTOS-BUSTILLO** (hereinafter “**BUSTILLO**”) has agreed to plead guilty as charged to the two-count indictment charging him with illegal use of a social security number, in violation of Title 42, United States Code, Section 408(a)(7)(B), and false statements to U.S. citizenship in violation of Title 18, United States Code, Section 1015(e).

A U.S. Immigration and Customs Enforcement (hereinafter “ICE”) immigration enforcement agent (hereinafter “agent”) would testify that he encountered **BUSTILLO** who the agent identified

as an alien. The agent would further testify that **BUSTILLO** had in his possession a Louisiana Identification Card under the name Jorge Rodriguez-Solis.

A Louisiana State Police Trooper (hereinafter “trooper”) would testify that on September 19, 2011, he was contacted by ICE agents about a man presenting a Louisiana Driver’s License. The trooper would testify he acquired the license under the name of “Jorge Luis Rodriguez-Solis” and verified it was authentic by accessing various Louisiana Department of Motor Vehicles databases. The trooper would testify he contacted the Louisiana Department of Motor Vehicles and was provided a August 14, 2008 Affidavit of Application for Louisiana Identification Card signed by **BUSTILLO** among other documents. The trooper would further testify that the name on the August 14, 2008 Affidavit of Application for Louisiana Identification Card was “Jorge Luis Rodriguez-Solis” and the social security number was XXX-XX-2177.

The trooper would testify that he advised **BUSTILLO** of his Miranda rights and conducted a taped interview in which **BUSTILLO** admitted applying for a Louisiana Identification Card on August 14, 2008 in Houma, LA. The trooper would further testify that **BUSTILLO** admitted to being an alien. The trooper would testify that **BUSTILLO** admitted that on August 14, 2008 he knowingly falsely represented himself as a citizen of the United States by presenting a Puerto Rican birth certificate under the name Jorge Luis Rodriguez-Solis in order to obtain a Louisiana Identification Card. The trooper would further testify **BUSTILLO** admitted that on August 14, 2008 he knowingly represented that the social security number XXX-XX-2177 belong to him, when in fact **BUSTILLO** knew the social security number did not belong to him, in order to obtain a Louisiana Identification Card.

An official with the Social Security Administration would testify that the social security number XXX-XX-2177 used was not assigned to **BUSTILLO**.

JOSEPH LA ROCCA
Special Assistant United States Attorney

Date

YONI JAVIER SANTOS-BUSTILLO
Defendant

Date

ROMA A. KENT
Attorney for YONI JAVIER SANTOS-BUSTILLO

Date